

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KPM ANALYTICS NORTH AMERICA
CORPORATION,

Plaintiff.

V.

Civil Action No. 21-10572-MRG

BLUE SUN SCIENTIFIC, LLC, THE
INNOVATIVE TECHNOLOGIES GROUP &
CO., LTD., ARNOLD EILERT, MICHELLE
GAJEWSKI, ROBERT GAJEWSKI,
RACHAEL GLENISTER, GREGORY
ISRAELSON, IRVIN LUCAS, AND PHILIP
OSSOWSKI,

Defendants.

JOINT MOTION TO AMEND PRE-TRIAL DEADLINES

Plaintiff, KPM Analytics North America Corporation, and the Defendants, Blue Sun Scientific, LLC, The Innovative Technologies Group & Co., Ltd., Arnold Eilert, Robert Gajewski, Rachael Glenister, and Irvin Lucas, hereby file this Joint Motion to Amend the Pre-Trial Deadlines set by this Court's Order of March 28, 2023 (ECF No. 172) to adjust certain deadlines in order to better comport with the current trial schedule. Namely, the Court's extension of the prior dates each by one week causes congestion and would have certain deadlines come after the Final Pre-Trial Conference. No party will be prejudiced by the proposed adjustments to the Pre-Trial deadlines. The parties jointly request that the Court amend the deadlines as follows:

Joint Pre-Trial Memorandum: April 24, 2023 (moved from April 28th)

Trial Briefs and Motions *in Limine*: April 25, 2023 (moved from April 28th)

Oppositions to Motions *in Limine*: May 1, 2023 (moved from May 2nd)

The following existing deadlines would not be changed:

Objections to Witnesses, Deposition Designations, and Exhibits (April 17th);

Meet and Confer on Settlement (April 24th); and

Final Pre-Trial Conference (April 26th).

WHEREFORE, the parties jointly move this Court to Amend the Pre-Trial Deadlines set by this Court's Order of March 28, 2023 (ECF No. 172).

Respectfully submitted,

PLAINTIFF,
KPM Analytics North America, Corp.

By its attorneys,

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DEFENDANTS,
Arnold Eilert, Robert Gajewski,
Rachael Glenister, and Irvin Lucas

DEFENDANTS,
Blue Sun Scientific, LLC and The
Innovative Technologies Group &
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By its attorneys,

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Dated: April 12, 2023